

DAVID CHIU, State Bar #189542
City Attorney
JONATHAN ROLNICK, State Bar #151814
Chief Labor Attorney
PETER A. COWNAN, State Bar # 255910
CAROLINE M. PAGE, State Bar #313798
Deputy City Attorneys
Fox Plaza
1390 Market Street, Fifth Floor
San Francisco, California 94102-5408
Telephone: (415) 554-3863
Telephone: (415) 554-3849
E-Mail: peter.cownan@sfcityatty.org
E-Mail: caroline.page@sfcityatty.org

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO;
WILLIAM SCOTT AND GREG SUHR

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FREDERICK (RIC) SCHIFF; GLENN
BRAKEL; ALICE DICROCE; JOSEPH
EMANUEL; BRIAN GREER; CLAYTON
HARMSTON; STEVEN HASKELL; MICAH
HOPE; DANIEL KELLY; ALEXANDER
LENTZ; BRANDON MCKELLEY; GERALD
NEWBECK; DAVID O'KEEFFE;
CHRISTOPHER RITTER, STEVEN UANG
AND THOMAS WALSH,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO; GREG SUHR,
INDIVIDUALLY; WILLIAM (BILL)
SCOTT, INDIVIDUALLY, AND DOES 1-20,

Defendants.

Case No. 4:19-cv-03260-YGR

**DECLARATION OF JENNIFER LO IN
SUPPORT OF DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT OR, IN THE
ALTERNATIVE, PARTIAL SUMMARY
JUDGMENT/ SUMMARY ADJUDICATION**

Hearing Date: July 26, 2022
Time: 2:00 p.m.
Place: Courtroom 1, 4th Floor
Judge: Hon. Yvonne Gonzalez Rogers

Date Action Filed: June 11, 2019
Date FAC Filed: June 26, 2019
Date TAC Filed: April 28, 2020
Trial Date: None

1 I, Jennifer Lo, declare as follows:

2 1. I am the Public Safety Team Supervisor in the San Francisco Department of Human
3 Resources. I have held this position since January 2022. Prior to my current position, I was a Senior
4 Human Resource Analyst on the Public Safety Team from 2007 to 2019.

5 2. I have personal knowledge of the facts in this declaration and, if called upon to testify,
6 could and would testify competently to the facts contained herein.

7 3. Attached as **Exhibit A** is a true and correct copy of a spreadsheet identifying the
8 demographic data for the Q50 eligible candidates involved with the 2017-2019 SFPD promotion
9 rounds. This spreadsheet was compiled by the Public Safety Team as a part of our team's regular
10 practice, was created at or near the time the underlying eligible list was in effect or soon after it
11 expired, is maintained in the Public Safety Team's records, and is relied upon in the normal course of
12 business.

13 4. Attached as **Exhibit B** is a true and correct copy of a spreadsheet identifying the
14 demographic data for the Q60 eligible candidates involved with the 2017-2019 SFPD promotion
15 rounds. This spreadsheet was compiled by the Public Safety Team as a part of our team's regular
16 practice, was created at or near the time the underlying eligible list was in effect or soon after it
17 expired, is maintained in the Public Safety Team's records, and is relied upon in the normal course of
18 business.

19 5. Attached as **Exhibit C** is a true and correct copy of a spreadsheet identifying the
20 demographic data for the Q80 eligible candidates involved with the 2016-2019 SFPD promotion
21 rounds. This spreadsheet was compiled by the Public Safety Team as a part of our team's regular
22 practice, was created at or near the time the underlying eligible list was in effect or soon after it
23 expired, is maintained in the Public Safety Team's records, and is relied upon in the normal course of
24 business.

25 6. Attached as **Exhibit D** is a true and correct copy of the job announcement for Q50
26 Sergeant recruitment ##CBT-050-901237. This job announcement was kept as a part of our team's
27 regular practice, was created at the time the announcement was made, is maintained in the Public
28 Safety Team's records, and is relied upon in the normal course of business.

1 ///

2 7. Attached as **Exhibit E** is a true and correct copy of the job announcement for Q60
3 Lieutenant, recruitment #CBT-Q060-901238. This job announcement was kept as a part of our team's
4 regular practice, was created at the time the announcement was made, is maintained in the Public
5 Safety Team's records, and is relied upon in the normal course of business.

6 8. Attached as **Exhibit F** is a true and correct copy of the job announcement for Q80
7 Captain, recruitment #CBT-Q080-900532. This job announcement was kept as a part of our team's
8 regular practice, was created at the time the announcement was made, is maintained in the Public
9 Safety Team's records, and is relied upon in the normal course of business.

10
11 I declare under penalty of perjury that the foregoing is true and correct. Executed on May 26,
12 2022 in San Francisco, California.

13
14 
15 _____
16 Jennifer Lo
17
18
19
20
21
22
23
24
25
26
27
28